## **REMARKS:**

In the outstanding Office Action, the Examiner rejected claims 1-16. Claims 1, 6, 11 and 16 are amended herein. No new matter is presented. Thus, claims 1-16 are pending and under consideration. The rejections are traversed below.

## REJECTION UNDER 35 U.S.C. § 102(b):

Claims 1-16 were rejected under 35 U.S.C. § 102(b) as being anticipated by Japanese Pat. App. No. H03-131981 (Kazuo).

<u>Kazuo</u> is directed to selecting an image having a predetermined connection relation with a currently selected image so that the selected image is processed after the currently selected image. For example, when a user selects a circle shaped image, triangle shaped images that are connected to the circle shaped image are sequentially selected (see, FIG. 2 and corresponding text). That is, <u>Kazuo</u> is directed to sequentially selecting image(s) based on a predefined connection relation of the image(s) with a user selected image (i.e., selection is restricted to connected images).

In contrast to <u>Kazuo</u>, the present invention eliminates the need for individually selecting elements of figures without restricting the selection to figures having connected, sequential or uniform elements. For example, as illustrated in FIGS. 10 and 11 of the application, non-connected figure elements on a particular straight line can be selected based on the figure elements' relationship to each other, and figure elements that are regarded as connected after execution of a subsequent process, such as error correction, are selected.

Independent claim 1 recites, "designating one of the figure elements" and "retrieving another figure element which is related to the designated figure element without requiring that the other figure element be connected with the designated figure element." Similarly, claims 6 and 11 recite that the present invention retrieves figure element(s) "related to the designated figure element without requiring that the other figure element be connected with the designated figure element."

Independent claim 16 recites, "automatically retrieving elements of the figure in accordance with said defined relationship of the elements upon selection of one of the elements in the relationship without requiring that said one of the elements be connected with the retrieved elements."

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<u>Kazuo</u> that sequentially selects images having a predefined connection relationship does not teach or suggest the above-discussed features of independent claims 1, 6, 11 and 16.

For at least the above-mentioned reasons, claims depending from the independent claims are patentably distinguishable over <u>Kazuo</u>. For example, claims 2, 7 and 12 recite that the present invention includes retrieving a figure element(s) "in a neighborhood of the designated figure element." <u>Kazuo</u> does not teach or suggest these features of claims 2, 7 and 12.

Therefore, withdrawal of the rejection is respectfully requested.

## **CONCLUSION:**

There being no further outstanding objections or rejections, it is submitted that the application is in condition for allowance. An early action to that effect is courteously solicited.

If there are any formal matters remaining after this response, the Examiner is requested to telephone the undersigned to attend to these matters.

If there are any additional fees associated with filing of this Amendment, please charge the same to our Deposit Account No. 19-3935.

Respectfully submitted,

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